

Removing the "established business relationship" qualification from the fax regulations, forcing associations to obtain the written consent of their own members, clients and industry partners before transmitting any fax that could be interpreted as commercial in nature will have an adverse effect on our operations. Using our time and resources to obtain written member consent will mean that less of both can be spent on our mission, which is to assure that every patient receives optimal nutrition care. Our members care for some of the most seriously ill people in the world, and it is essential that all of our limited resources go towards helping them provide the best care possible.

The association community has already raised numerous concerns about the new regulations that remain a subject of speculation, including exactly which transmissions the FCC would interpret as commercial in nature, whether written consent to a national association would extend to chapter or affiliate faxes, and whether a written consent form would expire with membership. We also have concerns about how this will impact our fax-on-demand system, which members use to access information about clinical conferences, new books, and other information essential to their practices.

We urge you to re-consider these regulations as they pertain to the not-for-profit community.